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October 8, 2008

FILED VIA ECF

Hon. Charles P. Sifton
United States District Court
Eastern District of New York
225 Cadman Plaza East
New York, New York 11201

RE: United States v. Nikolai Dozortsev
Docket No.: 07 CR 736 (S-2) (CPS)

Dear Judge Sifton:

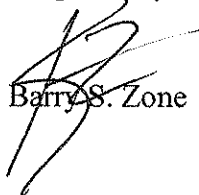
On behalf of the Defendant, Nikolai Dozortsev, and with the consent of both the Government and counsel for Defendants Arthur Dozortsev and Ricardo Fanchini, we write to respectfully request that Your Honor extend the time period for the Defendants to submit their pre-trial motions from October 10, 2008 until October 14, 2008. We make this request because the Government and the defendants have been involved in extensive plea negotiations which have culminated in the conveyance this afternoon of a plea-offer to the defendant Ricardo Fanchini. We expect that if the Government's offer is accepted, this matter may be closer to full resolution, possibly rendering the motion practice unnecessary. Due to counsel for defendant Fanchini, Gerald L. Shargel, and my observance of the Jewish holiday tonight and tomorrow, final discussions concerning a possible resolution of this matter are not likely to take place until Friday, the day our pre-trial motions are presently due.

The Court has ordered that all pre-trial motions be fully briefed by October 22, 2008. Should the Court grant the defendants the requested short extension to file their motions, it is understood by all parties that the October 22, 2008 date will be left unchanged.

Given the foregoing, it is respectfully requested that defendants' time to file their pre-trial motions be extended from October 10, 2008 to October 14, 2008.

Thank you for your consideration.

Respectfully,



Barry S. Zone

cc.: All counsel